

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

ANDREW L. COLBORN,

Plaintiff

NETFLIX, INC., et al.,

Defendants.

Case No. 19-CV-484

**UNOPPOSED CIVIL L.R. 7(h) EXPEDITED
MOTION TO AMEND SCHEDULING ORDER**

Plaintiff, by his undersigned counsel, respectfully moves the Court for amendment of the Scheduling Order deadlines, pursuant to Fed.R.Civ.P. 16(b)(4) and Civil Local Rule 7(h), to the dates set forth in the proposed Amended Scheduling Order that is being submitted separately by email in conjunction with the motion. In support of this motion, Plaintiff states as follows:

1. The parties have already engaged in extensive written discovery and are in the process of reviewing documents. They expect some additional written discovery in the coming days before the deadline for serving such discovery expires, but they are now in a position to schedule depositions of party and non-party witnesses.
2. The proposed amendments to the Scheduling Order do not enlarge the time for serving written discovery but provide for a brief extension (approximately 6 weeks) of the deadline for conducting depositions. The amendments similarly extend the deadlines for events occurring after the close of fact discovery, such as expert discovery and dispositive motion deadlines.
3. There is good cause to extend the deadlines as proposed because it would afford the parties more time to accommodate scheduling of depositions with due

consideration for multiple attorneys' involvement and the schedules of the witnesses.

4. I am authorized to represent that Defendants do not oppose this motion.

Dated this 18th day of February, 2022.

By: /s/ April Rockstead Barker
April Rockstead Barker
State Bar No. 1026163
Schott, Bublitz & Engel, S.C.
640 W. Moreland Blvd.
Waukesha, WI 53188-2433
(262)-827-1700

LAW FIRM OF CONWAY, OLEJNICZAK & JERRY, S.C.
Attorneys for Plaintiff, Andrew L. Colborn

POST OFFICE ADDRESS:

231 S. Adams Street
Green Bay, WI 54301
P.O. Box 23200
Green Bay, WI 54305-3200
Phone: (920) 437-0476
Fax: (920) 437-2868
State Br No. 1005964

GRIESBACH LAW OFFICES, LLC
Attorney Michael C. Griesbach
State Bar No. 01012799
Griesbach Law Offices, LLC
PO Box 2047
Manitowoc, WI 54221-2047
(920) 320-1358